

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

July 31, 2017

Jamie Guillory Regulatory Specialist Unique Solutions, Inc. c/o Spring Trading Company 203 Dogwood Trail Magnolia, TX 77354

Subject: Notification per PRN 98-10 – Minor label modifications

Product Name: Ahh-some Gel EPA Registration Number: 84409-1 Application Date: June 1, 2017 Decision Number: 530084

Dear Ms. Guillory:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you have any questions, you may contact Tara Flint via email at flint.tara@epa.gov or Eric Miederhoff at Miederhoff.eric@epa.gov.

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Sincerely,

Eric Miederhoff

Product Manager 31

Regulatory Management Branch I Antimicrobials Division (7510P)

Office of Pesticide Programs

NOTIFICATION

84409-1

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

07/31/2017

MASTER LABEL

Primary Brand Name: Ahh-Some Gel® Hot Tub/Jetted Bath Plumbing & Jet Cleaner

Alternate Brand Name: Ahh-Some® ABC 3N1

ACTIVE INGREDIENTS:

Alkyl (60%C ₁₄ , 30%C ₁₆ , 5%C ₁₂ , 5%C ₁₈ , dimethyl	l benzyl ammonium
Chloride	54.27%
INERT INGREDIENTS	<u>45.73%</u>
TOTAL:	100.00%

KEEP OUT OF REACH OF CHILDREN

DANGER

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

FIRST AID	
IF IN EYES:	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	 Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water, if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF INHALED:	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
IF ON SKIN OR CLOTHING:	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center at (800) 858-7378 for general or medical information.

Hot Tub Graphics (may appear on front label)





PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS

AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed or Inhaled. Harmful it absorbed through the skin. Do not get in eyes, on skin, or on clothing. Do not breathe vapor or spray mist. When handling, wear protective eyewear (goggles or face shield), coveralls worn over long-sleeved shirt and long pants, socks, chemical resistant footwear, chemical resistant gloves and a respirator with an organic vapor removing cartridge with a pre-filter approved for pesticides (MSHA/NIOSH approval number prefix TG-23C) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE pre-filter. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, oysters, and shrimp. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your Slate Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame. Do not mix with oxidizers, soap or other anionic materials

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Jetted Tubs or Whirlpool bathtubs are defined as tubs that are used for bathing or soaking and drained after each successive use. This is not to be confused with Hot Tubs or Spas where the water is used for 4-6 months.

Fill the Jetted Tub or Whirlpool Bath over the top jets. This is usually 50-60 gallons.

You can use hot or cold water, although hot/warm water dissolves the gel faster.

Add 1 (one) level teaspoon of gel per 100 gallons of water. Typical jetted tubs are 50-60 gallons filled over the top jet, so you may need half a teaspoon to do the job. You can pre-mix the gel with warm water so it dissolves faster. Wear chemical resistant gloves when mixing.

Start the jets so water is flowing through the system. Hot, warm or cold water is fine.

If you have an air intake nozzle (usually on top by the controls), open it to get ambient air to circulate into the tub and out the jets. This will cause an almost instant foaming to occur. Foaming can be controlled easily by reducing the amount of air entering the tub or by turning the pump off periodically. Foaming is NORMAL.

However, if your tub is overflowing with foam, you probably used too much gel. You want some foam to develop in this cleaning process, usually 3-6 inches on top of the water. Run the jets up to 15 minutes with the air intake valve (discussed previously) open. You should see brown specks and other dark colored particulates floating on the foam and clinging to the acrylic or porcelain tub. Now, drain the water and let the foam dissipate and drain.

Next, fill the tub up again and run the jets for a minute or so to get any clinging gunk from the jets that didn't come out previously. Drain and Rinse the tub with fresh water and wipe out the gunk that will be sticking to the inside of the tub with a spray cleaner. Mixing 1/2 of a level teaspoon of Ahh-Some to a gallon of water will make a great shell cleaner. Just get a 32 ounce empty trigger spray bottle at a dollar store and you're in business. Be sure to use chemical resistant gloves and not touch the gunk we eliminate from your plumbing and jets. Always use a bathroom cleaner and /or Ahh-Some cleaner in a well-ventilated room. Avoid breathing in the air around the tub while the purge is going on. You may wish to open a bathroom window or door while cleaning the tub with any product. If your tub is older and has not been properly cleaned in the past, it may be necessary to do this entire cleanout, "Purge" procedure more than once. This is NORMAL! Each time you will see remnants of the gunk that is harboring inside your plumbing system. Layer by layer we will work off the plaque-like gunk that is spewing into your tub as brown or black flecks. Eventually, it will remove all of the build-up. This can be frustrating but the cleaning process is simple and fast. Successive cleanings, after the initial purge, need ½ the typical amount of gel. Leave the bathroom during the cleaning cycle once you know there is no excessive foam overflowing. Ahh-Some is a non-acidic, septic tank safe product that will NOT harm O-rings, seals or plumbing connections. Keep children and pets away from filled jetted tub to prevent accidental drowning.

You should see a brownish scum on the tub/whirlpool shell after cleaning with Ahh-Some. This is NORMAL! This is the gunk and buildup you were exposing yourself to.

Purging Hot Tub/Spa Plumbing & Jets

Every 4-6 months you should purge your hot tub (SPA) of exfoliated skin, and other gunk that is clinging inside the plumbing infrastructure and jets. This is a simple process. Add about 1 LEVEL tablespoon (3 level teaspoons) of our gel to a 300-400 gallon hot tub just prior to your maintenance purge. Adjust gel amount for smaller or larger capacity hot tubs. Remove any snap on pillows that are removable so purged material doesn't stick to them. Run the pump(s) to attain maximum circulation. Be sure to open air intake valve(s). Foaming will appear quickly inside the vessel. This is NORMAL. Remove and rinse the filter(s) and place inside the hot tub water. Ahh-Some will "deep clean" the filters and remove deeply imbedded particulates. Run the jets and blower (if equipped) up to 30 minutes.

Shut the system down and drain and rinse the hot tub with fresh water. Remove the filter(s) from the tub and rinse off with a hose. Many filters harbor bacteria if not cleaned properly. Place the filter(s) back into the filter cavity. Wipe the hot tub as clean as possible. getting the sticky gunk off the interior finish. Be sure to dump as much of the dirty water as possible after doing this cleaning purge. Ideally, you get all the water out of the tub after this cleaning. Use chemical resistant gloves and a good cleaner when you rinse and wipe the shell. Mixing 1/2 tsp of Ahh-Some Gel to 1 gallon of water to make a wonderful cleaner for the acrylic shell wipe down. If your spa has a blower with air channel (holes in the bottom), this will be very difficult unless you can literally lift the spa so that the water in the channel flow to one area that you can scoop out. Some people use a shop vacuum to suck the remaining water out of the air channel system. That's it! Fill the hot tub with water to proper level. Add balancing chemicals and a sanitizer as usual. Remember to do this clean-out purge every 4-6 months so your water maintains a clear, fresh and balanced look. Water can hold only so much particulate matter before it begins to look cloudy and stressed. It is perfectly ok to drain the hot tub/spa Ahh-Some treated water on grass, flowers or plants.

Important Information You Should Know

Many hot tub owners find that maintaining their water so it is always crystal clear and inviting can be a difficult task. The reasoning here is that small water volumes with high contaminant concentrations, in hot water environments, can wreak havoc on water chemistry and sanitizer levels. If your hot tub is consuming more than average amounts of sanitizer on an ongoing basis and you need to keep bumping the levels up to keep it sanitary, you probably have a film issue within the system. Brand New hot tubs from the factory should have the plumbing purged before the first use. Manufacturers run water through the plumbing system to pressure and leak check before shipping. New tubs are NOT totally drained of this pre-check water fill allowing sludge, manufacturing gunk and other contaminants to colonize in the plumbing. Be sure to purge and clean with Ahh-Some before you start using your new hot tub for the first time and continue this purge process every 4-6 months. The way to keep your hot tub water healthy and inviting is to remember to do the following. Balance the water chemistry pH and total alkalinity. Maintain adequate sanitizer levels at all times. Purge the plumbing & jets with Ahh-Some as directed every 4-6 months. Use a reliable test kit regularly to check pH, total alkalinity and sanitizer levels. Do this and we GUARANTEE you the best water quality ever.

Start by using Ahh-Some before draining and refilling your hot tub. Change your hot tub water every 6 months as part of a healthy water maintenance routine.

STEP 1: PURGE & CLEAN YOUR HOT TUB PLUMBING Add 1 level tsp per 380L (100 US gallons.) of water to purge and clean the plumbing lines. Generally, there is no need to add more than 3 level teaspoons of gel for tubs up to 450 gallons. Swim Spas will generally require an entire 2 ounce container to complete the purge since there is a larger water capacity associated with this type of vessel. Open the air controls and turn the jet pumps on to high speed to run 15-20 minutes. Remove any removable pillows attached to the seat tops. Place filters in hot tub while "Purging". The deep cleaning scrubbing action of the foam will begin almost immediately. Brown will appear. Foaming is Normal. Stay close by and watch to ensure that the foam does not spill over the edges of the hot tub. If the foam looks like it is a sticky scum and will overflow the hot tub turn off your air

control (s) until the foam suds dissipate significantly enough to turn the air control(s) on again. You can also control the foaming by turning the jet pump off for a while to let the foam subside. Air is an important part of the cleaning process. If your hot tub is releasing a lot of brown scum into the foam, it may be necessary to operate the pumps on high speed again for another 20 minutes to allow Ahh-Some to continue to remove buildup, gunk and scum that has built up in your plumbing lines. After purging and deep cleaning is complete, turn off the pumps completely. Remove filters from the hot tub and rinse them thoroughly. Finally, drain the hot tub. Rinse and wipe thoroughly. Refill tub and reinstall the filters.

Step 2 0f 2: For weekly water care and maintenance we recommend Hot Tub SERUM Total maintenance to keep your hot tub clean.

Swimming Pool application

Ahh-Some® ABC 3N1 kills algae and keeps the water clear of visible algae. Ahh-Some. Wait a minimum of 15 minutes after addition of Ahh-Some before entering the pool. If using Ahh-Some ABC 3N1 for the first time, you will be astonished at how easy it is to use, and how hard it works to keep your pool looking great and your water chemistry in balance. And, one 6-ounce jar treats 15,000-20,000 gallons for 4 weeks! Follow the Ahh-Some 4 step pool care program:

Step 1: Test and balance the water Step 2: Add EPA registered Sanitizer Step 3: Shock every 7-10 days Step 4: Add the Ahh-Some ABC 3N1 as directed.

- First, check the pH and total alkalinity (TA). Adjust the pH to between 7.4-7.8 and get the TA (total alkalinity) between 80-120 PPM. Ahh-Some ABC 3N1 is a buffered product and will always try to keep your water balanced, based on the initial parameters at the time of its introduction. Ahh-Some ABC 3N1 is an EPA Registered Algaecide and Bio-Cleaner.
- Add Ahh-Some ABC 3N1 to the water, at the rate of 1 ounce per 2,500-3,300 gallons of water every 4 weeks (28 days). Just scoop it out and place it in the pool proper or the skimmer. Ahh-Some ABC 3N1 will break into smaller clumps and fully dissolve in minutes. You will see a small amount of foam as you add it. If you are using chlorine as a maintenance sanitizer you MUST add a shock treatment after Ahh-Some ABC 3N1 is added. If you have access to liquid chlorine, add 1-2 gallons for every 6 oz. container of Ahh-Some ABC 3N1. If you typically use a non-chlorine shock, this is ok, too. Note: Watch the free available chlorine closely for up to 48 hours after adding the Ahh-Some ABC 3N1.
- We recommend that you maintain a minimum of 1.5 PPM of Free Available Chlorine (FAC) for best results. In hot and humid environments where the pool gets high bather loads, you may wish to maintain a higher FAC, (free available chlorine) level.
- Don't forget to add Ahh-Some ABC 3N1 every 4 weeks. If you forget to add it, you'll see a rapid decline in water clarity. If you add it on schedule, your water will be the freshest, cleanest and highest quality water that you've ever experienced. Ahh-Some ABC 3N1 should reduce your overall maintenance chemical costs. The clarity and brilliance of your pool water should be the best ever. It also enhances your filter's ability to filter finer particulates and contaminants.

SPECIAL NOTES ABOUT Ahh-Some ABC 3N1:

- 1. Ahh-Some ABC 3N1 is guaranteed to work in any pool, no matter what type of sanitizer is used. Great for salt water pools and will help clean scale from electrolytic cell plates allowing your salt generator to work more efficiently.
- 2. You must still maintain adequate levels of sanitizer in your pool at all times.
- 3. If you use a cartridge or element filter, we recommend that you hose it (them) off before you add the Ahh-Some ABC 3N1. After this, put it (them) back in your filter and add Ahh-Some ABC 3N1. Your cartridges or elements will be cleaned thoroughly because of Ahh-Some ABC 3N1's surfactant qualities. With a sand or DE filter, we recommend that you backwash the filter a day or so after starting with this program.
- 4. Ahh-Some ABC 3N1 can be used in all pool surfaces.
- 5. Ahh-Some ABC 3N1 can be used with any and every sanitizing program on the market including Bacquacil®

Quick Step by Step Instructions at a Glance

SWIMMING POOLS

Treat with Ahh-Some every 4 weeks.

- 1. Adjust pH to 7.4-7.8.
- 2. Adjust Total Alkalinity to 80-120 ppm.
- 3. Shock Pool with your typical sanitizer or non-chlorine shock. NOTE: Chlorine demand may temporarily increase immediately after Ahh-Some treatment due to release of contaminants from pipes and pool surfaces into pool water. Watch closely for 48 hours.
- 4. Add Ahh-Some at rate of 1oz/2500-3300 gallons directly into pool water in front of inlets or directly into skimmer basket.

Unlike spas, tubs, etc. swimming pools will not usually display physical debris coming from the inlets. Your evidence that Ahh-Some ABC 3N1 is working will come from better looking and feeling water. Ahh-Some performs better and faster than most other clarifier brands available while dislodging slime buildup from the plumbing. Ahh-Some also is an algaecide. We not only clear cloudy water-we keep it clear because we help eliminate the build-up of plumbing particulates. When dislodged, these contaminants are brought into the pool water where sanitizers can eliminate them. TIP: Indoor pools will usually display a vastly improved smell.

Monthly maintenance applications of Ahh-Some Gel require no special equipment for treating water. The correct dilution for monthly maintenance is 1 ounce of the gel for every 2,500-3300 gallons of water and should be added in the pool skimmer or directly to the water.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Open dumping is prohibited Store only in original container. Do not reuse empty container. Keep this product under locked storage sufficient to make It inaccessible to children or persons unfamiliar with its proper use. Keep from freezing.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance **CONTAINER DISPOSAL** (Larger than 1 gal): Nonrefillable container: Do not reuse or refill this container Triple rinse (or equivalent) promptly after emptying. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. In addition, plastic containers may be disposed of by incineration, or if allowed by state and local authorities, by burning If burned, stay out of smoke. (For small containers) Do NOT reuse or refill this container. Triple rinse promptly after emptying and then offer it for recycling, reconditioning or place in the trash.

LIMITED WARRANTY AND DISCLAIMER

It is the manufacturer's intention that this product is to be used in accordance with the Directions for Use as stated on this label. The use of this product being beyond control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such use or the results to be obtained if not used in accordance with printed directions and established safe practice. To the fullest extent permitted by law, the buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages or injuries resulting from the use or handling of this product, whether or not based in contract, negligence, strict liability in tort or otherwise, shall be limited, at the manufacturer's option, to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed.

E.P.A. Reg. No. 84409-2

E.P.A. Est. No. 84409-AL-1

BATCH NO.

Manufactured by: UNIQUE SOLUTIONS INC.

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